

**GENOVA BURNS LLC**

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*Co-Counsel for Plaintiff, ADP, Inc. and*

*Non-Party Sandra Wijnberg*

*(To Be Admitted Pro Hac Vice)*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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SANDRA WIJNBERG,

Movant,

v.

MATTHEW LEVIN,

Respondent.

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CASE NO: \_\_\_\_\_

Underlying litigation:

*ADP Inc. v. Matthew Levin*

Case No. 2:21-cv-10574

United States District Court

For the District of New Jersey

**NONPARTY, SANDRA WIJNBERG'S,  
NOTICE OF MOTION TO QUASH SUBPOENA**

Pursuant to Fed. R. Civ. P. 45, Movant, Sandra Wijnberg (“Ms. Wijnberg”) respectfully requests that the Court enter an Order quashing the subpoena issued by Respondent, Matthew Levin in connection with the Subpoena served in *ADP, Inc. v. Matthew Levin*, Case No 2:21-cv-10574, pending in the United States District Court for the District of New Jersey (the “Lawsuit”). Ms. Wijnberg filed this motion in this District because this is the District for compliance with the Subpoena; however, as the recipient of the Subpoena, pursuant to Fed. R. Civ. P. 45(f), Ms. Wijnberg consents to the transfer of this motion to the District of New Jersey, where the Lawsuit is pending.

Ms. Wijnberg’s Motion to Quash is supported by the attached exhibits and incorporated memorandum of law.

WHEREFORE, Ms. Wijnberg respectfully requests this Court transfer this action to the District of New Jersey, where the Lawsuit is pending, or otherwise grant the instant Motion and quash the Subpoena issued to Ms. Wijnberg, as well as award her costs and fees for being required to file the instant Motion.

April 20, 2022

**GENOVA BURNS LLC**

/s/ Harris S. Freier

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 20, 2022, I caused to be service a true copy of  
NONPARTY, SANDRA WIJNBERG'S, NOTICE OF MOTION TO QUASH  
SUBPOENA via CM/ECF filing and electronic mail.

/s/ Harris S. Freier

HARRIS S. FREIER, ESQ